

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO. 09-079</b>
<b>v.</b>	*	<b>SECTION: "I"</b>
<b>BILLY RAY LAWRENCE</b>	*	

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**F A C T U A L   B A S I S**

The Defendant, **BILLY RAY LAWRENCE** (hereinafter, "Lawrence"), has agreed to plead guilty as charged to the one-count bill of information charging him with theft of government money, in violation of Title 18, United States Code, Section 641.

Should this matter have gone to trial, the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the bill of information now pending against the defendant:

Pursuant to legislation passed by the Congress of the United States of America, with the approval of the President of the United States, funds were appropriated to the Department of Housing and Urban Development ("HUD") for a Community Development Block Grant ("CDBG") for Louisiana hurricane victims. HUD is, and was, at the time of the offense, an

agency or department of the United States of America. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program (“LRHP”). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the LRHP.

One of the major requirements for receiving grant money from LRHP, was that the damaged property be the primary residence of the applicant on August 29, 2005.

At the time Hurricane Katrina made landfall, on August 29, 2005, **DEFENDANT LAWRENCE** owned a residence located at 3417 Short Street, New Orleans, Louisiana 70125, which he did not occupy. From on or about March 2005 to about August 29, 2005, **DEFENDANT LAWRENCE’s** residence located at 3417 Short Street, New Orleans, Louisiana 70125, was occupied by his sibling, **J.B.**, who lived alone and used the property as her primary residence.

On the date Hurricane Katrina struck Louisiana, **DEFENDANT LAWRENCE** used as his primary residence a home located at 2227 Easter Lane, New Orleans, Louisiana 70114.

On or about February 28, 2007, in the Eastern District of Louisiana **DEFENDANT LAWRENCE** submitted his completed application for a grant under the LRHP. The application stated that **DEFENDANT LAWRENCE’S** primary residence on the date Hurricane Katrina struck Louisiana, August 29, 2005, was 3417 Short Street, New Orleans, Louisiana 70125.

On or about January 17, 2008, **DEFENDANT LAWRENCE** closed on his LRHP grant. As a prerequisite to the closing, **DEFENDANT LAWRENCE** was required to sign, and

did in fact sign, the Road Home Grant Recipient Affidavit, stating that his primary residence on the date Hurricane Katrina struck Louisiana, August 29, 2005, was 3417 Short Street, New Orleans, Louisiana 70125.

As a result of his actions on his application for funds and money and Road Home Grant Affidavit described above, on January 28, 2007, the defendant, **BILLY RAY LAWRENCE**, received direct financial assistance from the LRHP totaling \$68,486.31.

Further, as a result of his actions on his application for funds and money and Road Home Grant Affidavit described above, on October 23, 2008, the defendant, **BILLY RAY LAWRENCE**, received additional direct financial assistance from the LRHP in the form of an elevation grant totaling \$30,000.

On or about January 20, 2009, **DEFENDANT LAWRENCE** willingly repaid \$30,000, in the form of a cashier's check, to LRHP.

By engaging in the behavior outlined above, **DEFENDANT LAWRENCE** did knowingly embezzle, steal, purloin, and convert to his own use HUD benefits to which he knew he was not entitled.

The above facts come from an investigation conducted by agents from the Department of Housing and Urban Development - Office of the Inspector General and the Federal Bureau of Investigation, as well as the admissions of the defendant, **BILLY RAY LAWRENCE**.

The above facts would have been proven beyond a reasonable doubt by credible testimony of agents from the Department of Housing and Urban Development - Office of the Inspector General and the Federal Bureau of Investigation, other HUD and FBI employees, documents and records of HUD, copies of deposit statements, and **DEFENDANT LAWRENCE'S** own confession to agents from the Department of Housing and Urban

Development - Office of the Inspector General and the Federal Bureau of Investigation.

**APPROVED AND ACCEPTED:**

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BILLY RAY LAWRENCE	Date
Defendant	

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PROVINO MOSCA	Date
(LA Bar No. _____)	
Attorney for Defendant Lawrence	

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JORDAN GINSBERG	Date
(IL Bar. No. 6282956)	
Assistant United States Attorney	

